

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

JOHN F. KENNEDY FEDERAL BUILDING BOSTON, MASSACHUSETTS 02203-0001

September 11, 1996

Lewis Horzempa Alan Fowler Foster Wheeler Environmental Corporation 470 Atlantic Avenue Boston, MA 02210

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Re:

New Bedford Harbor ROD 2 Proposed Plan Cost Estimates: New Assumptions for Calculating Air Monitoring Costs

Dear Messrs. Horzempa and Fowler,

On August 14, 1996 EPA-New England presented the proposed \$127 million ROD 2 remedy to the agency's national Remedy Review Board. Although the board gave their overall support to the proposed remedy, they did have specific concerns about the "disproportionate" costs for water treatment (\$27.1m) and air monitoring (\$10.5m). As a result, these two line items are being revisited as we proceed through the proposed plan and ROD-issuance phases. While EPA-New England pursues issues surrounding interpretation of water treatment ARARS, the purpose of this letter is to provide revised assumptions for re-estimating the ROD 2 air monitoring costs (for both CDF and off-site locations). The new assumptions are listed below, along with the original assumptions:

1. CDF Locations

Original Assumptions:

- 24 total stations

(6 per CDF)

- 2 sample episodes
 per week during filling
- 2 episodes per month during the first year of settling, 1 sample per month during the 2nd and 3rd year of settling (48 total episodes x 24 stations = 1,152 samples during settling)

New Assumptions:

- 19 total stations
 - 5 at CDF A
 - 5 at CDF B
 - 4 at CDF C
 - 5 at CDF D
- 1/week Jun Aug
- 2/month Apr, May, Sep, Oct
- 1/month Nov Mar
- 1 episode per month for the first year, quarterly sampling for the second and third year (20 total episodes x 19 stations = 380 samples during settling)

2. Off-Site Locations

- 10 total stations
- 1 sample episode per day during the first six months of dredging
- 3 episodes per week during the second six months of dredging
- 2 episodes per week for the remaining of dredging operations

- 9 total stations
- 1/week Jun-Aug, 2/month Apr, May, Sep, Oct, and 1/month Nov-Mar for the full duration of dredging operations

The recalculation of these air monitoring costs are to be performed per work assignment #12. Please try to report the results to me by Wednesday 9/25/96. Do not hesitate to contact me should you have any question in this regard.

Sincerely,

David Dickerson,

Remedial Project Manager

cc:

- F. Ciavatierri
- L. Brill
- C. Catri
- P. Craffey